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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

BRENDA RENEE BESSON,
Plaintiff,

vs.

KILOLO KIJAKAZI, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:22-cv-00365-AWI-BAM
STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from August 29, 2022 to October 28, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR). A review of the records received shows

1 Counsel has received at least 50 CARs, the majority of which were filed in June
2 2022.

3 Additionally, for the weeks of August 29, 2022 and September 5, 2022,
4 Counsel currently has 15 merit briefs, and several letter briefs and reply briefs.
5 Additional time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

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9 Respectfully submitted,

10 Dated: August 18, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff
15

16 Dated: August 18, 2022 PHILLIP A. TALBERT
17 United States Attorney
18 PETER K. THOMPSON
19 Acting Regional Chief Counsel, Region IX
20 Social Security Administration
21

22 By: */s/ Andrea Banks
23 Andrea Banks
24 Special Assistant United States Attorney
25 Attorneys for Defendant
26 (*As authorized by email on August 18, 2022)
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ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's request for an extension of time to file a Motion for Summary Judgment is GRANTED. Plaintiff shall file a Motion for Summary Judgment on or before October 28, 2022. All other deadlines in the Court's Scheduling Order are modified accordingly. No further extensions of time will be granted absent a demonstrated showing of good cause.

IT IS SO ORDERED.

Dated: August 19, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE